

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS; *et al.*,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his
official capacity as Chair of the House
Standing Committee on Redistricting; *et al.*,

Defendants.

Civil Action No. 23-CV-1057

NORTH CAROLINA STATE
CONFERENCE OF THE NAACP; *et al.*,

Plaintiffs,

v.

PHILIP BERGER, in his official capacity as
the President Pro Tempore of the North
Carolina Senate; *et al.*,

Defendants.

Civil Action No. 23-CV-1104

**LEGISLATIVE DEFENDANTS' NOTICE OF FILING OF OBJECTIONS TO
NAACP PLAINTIFFS' DEPOSITION DESIGNATIONS**

Pursuant to the parties' agreement and the scheduling orders in this case, Legislative Defendants hereby give notice of and submit objections to NAACP Plaintiffs' Deposition Designations, D.E. 160, from the October 10, 2024 deposition of Representative Mary Price Harrison.

The objections to NAACP Plaintiffs' designated excerpts are identified as follows:

1. **From 122:13 to 122:16:** Legislative Defendants object to this deposition designation on the grounds that it is incomplete because it does not fully capture the question and response. Legislative Defendants offer a cross-designation of 121:11 to 122:16 to resolve this objection, as reflected in the pink highlighting in the attached **Exhibit 1¹**.

2. **From 151:4 to 152:4:** Legislative Defendants object to this deposition designation on the grounds that it is incomplete because it does not fully capture the line of questioning necessary to determine what “concerns” are being referenced. Legislative Defendants offer a cross-designation of 150:6 to 152:4 to resolve this objection, as reflected in the pink highlighting in Exhibit 1.

Respectfully submitted, this the 22nd day of July, 2025.

BAKER & HOSTETLER LLP

Katherine L. McKnight*
DC Bar No. 994456
Richard B. Raile*
DC Bar No. 1015689
Trevor Stanley*
DC Bar No. 991207
1050 Connecticut Ave. NW
Suite 1100
Washington DC 20036
Ph: (202) 861-1500
kmcknight@bakerlaw.com
rraile@bakerlaw.com
tstanley@bakerlaw.com

Patrick T. Lewis*

**NELSON MULLINS RILEY &
SCARBOROUGH LLP**

By: /s/ Phillip J. Strach
Phillip J. Strach
North Carolina State Bar No. 29456
Alyssa M. Riggins
North Carolina State Bar No. 52366
Cassie A. Holt
North Carolina State Bar No. 56505
Jordan M. Koonts
North Carolina State Bar No. 59363
301 Hillsborough Street, Suite 1400
Raleigh, North Carolina 27603
Ph: (919) 329-3800
phil.strach@nelsonmullins.com
alyssa.riggins@nelsonmullins.com
cassie.holt@nelsonmullins.com

¹ Attached as Exhibit 1 are NAACP Plaintiffs’ highlighted designations filed on July 17, 2025 (in yellow) at D.E. 160-2, with Legislative Defendants’ counter-designations highlighted (in pink).

Ohio State Bar No. 0078314
Key Tower
127 Public Square, Suite 2000
Cleveland, Ohio 44114
Ph: (216) 621-0200
plewis@bakerlaw.com

jordan.koonts@nelsonmullins.com

Counsel for Legislative Defendants

Erika D. Prouty*
Ohio State Bar No. 0095821
Anna Croyts*
Ohio State Bar No. 0104620
200 Civic Center Drive, Suite 1200
Columbus, Ohio 43215
Ph: (614) 462-4710
eprouty@bakerlaw.com
acroyts@bakerlaw.com

**Appeared via Special Notice*

CERTIFICATE OF SERVICE

I hereby certify that on this day the forgoing document was filed on the Court's electronic case filing system (CM/ECF), and that notice of the filing will be served on all counsel of record by the Court's system.

This the 22nd day of July, 2025.

**NELSON MULLINS RILEY &
SCARBOROUGH LLP**

By: /s/ Phillip J. Strach
Phillip J. Strach
North Carolina State Bar No. 29456